

NO. PD-0722-19

THE STATE OF TEXAS

VS

Braden Daniel Price

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In The Texas Court
Of Criminal Appeals
Austin, Texas

FILED
COURT OF CRIMINAL APPEALS
12/27/2019
DEANA WILLIAMSON, CLERK

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE JUDGES OF THE TEXAS COURT OF CRIMINAL
APPEALS, AUSTIN, TEXAS:

NOW COME RONALD P. GUYER, Attorneys for MR. Braden Daniel

Price, Appellee in the above styled case request the Court to grant an
extension of thirty days to file his Reply brief to the Appellant States
brief, and in support of this request would show the Court as
follows:

I.

S t a t e m e n t O f T h e C a s e ,

Officers of the San Antonio Police Department seized luggage belonging to Mr. Price at the San Antonio International Airport as he was exiting. The luggage was searched without a warrant. Mr. Price was charged with possession of marijuana. Mr. Price filed a motion to suppress evidence and the Judge of the 175th Judicial District Bexar County, Texas Denied the Motion. Mr. Price entered a conditional plea of guilty and appealed the conviction to the Fourth Court of Appeals. The Fourth Court of Appeals reversed the decision of the trial Court and the State requested discretionary review by this C o u r t , which was granted and the State filed their brief on November 25, 2019. Appellee request a thirty day extension to file a Reply Brief.

II

**Request For An Extension Of Time
To
File Mr. Price's Reply Brief**

Mr. Price's reply brief is due for filing on Thursday December 26, 2019. Counsel respectfully request an extension to Monday January 28, 2019 to file Mr. Price's reply brief to the Appellant States brief.

III

Grounds for Extension

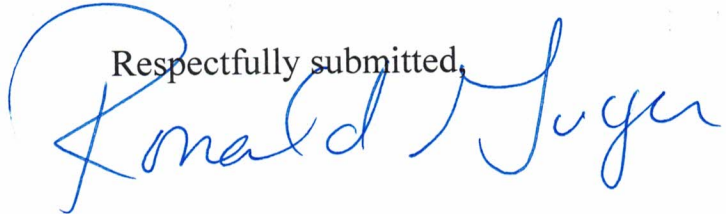
a. Counsel maintains a full criminal trial practice in the State Courts as well as federal cases in the San Antonio and Del Rio divisions .Counsel has had multiple settings in federal court in both San Antonio and Del Rio.

b. Counsel has traveled to New York. for Holidays to spend time with his daughter and grandchildren for the Thanksgiving and now Christmas. Counsel apologizes for his tardiness. Counsel ask that this Court find good cause for this request and extend the time to file the due date.

PRAYER

FOR ALL OF THESE REASONS, COUNSEL respectfully prays that this Court will grant the request to file this extension until January 28, 2019 to file Mr. Price's reply brief to the Appellants States brief.


Respectfully submitted,



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CETIFICATE OF SERVICE

I certify that a true and correct copy of this Motion was efiled
On this 25th day of December 2019.


RONALD P. GUYER